



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

June 11, 2008

Anna Burger, Treasurer
Service Employees International Union
Committee on Political Education (SEIU COPE)
1800 Massachusetts Ave NW
Washington, DC 20036

Response Due Date:
July 14, 2008

Identification Number: C00004036

Reference: March Monthly Report (2/1/08-2/29/08)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 4 items:

1. Schedule D supporting Line 10 of your report discloses debts incurred this period totaling \$175,000 owed to "SEIU (General Fund)" for apparent independent expenditures. In memo text you state, "obligation for estimated expenses of \$55,000 reported 2/29 and \$120,000 of the total \$420,000 estimate reported 2/25 that were not paid as of 2/29." However, a MEMO Schedule E has not been provided for the 2/29 expense totaling \$120,000. Please be advised that if a communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR § 104.11. Subsequently, when the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable. Please amend your report to clarify this apparent discrepancy or provide clarifying information regarding the nature of this debt.

2. Schedule A supporting Line 15 of your report discloses an offset to an operating expenditure(s) totaling \$5,000 and \$2,263.74 from "Moveon.org Political Action" and "Wisconsin State Council, SEIU," respectively;

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however, your report(s) does not appear to disclose a disbursement to these entities. Please provide clarifying information regarding this activity and amend your report(s) if necessary.

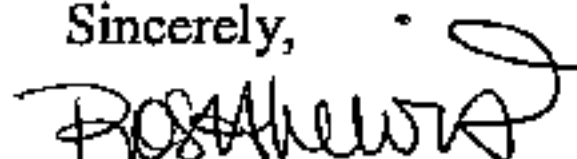
3. Please clarify all expenditures made for "advance for future media buy" on Schedule B. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedules B or E supporting Lines 23 or 24 and include the amount, name, address and office sought by each candidate. 11 CFR §§104.3(b) and 106.1

4. Schedule B discloses an expenditure(s) for "polling." If a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) or voter drive activity (under 11 CFR §106.6(b)(2)(i)) containing express advocacy as defined under 11 CFR §100.22, this would constitute an in-kind contribution or an independent expenditure and should be properly disclosed on a Schedule B or E supporting Line 23 or 24 as appropriate. Public communications and voter drive activity that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate should be reported on Schedule B for Line 21(b) of the Detailed Summary Page. Please clarify whether this activity contained express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1152.

Sincerely,



Rosa G. Lewis
Senior Campaign Finance Analyst
Reports Analysis Division

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